

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

PETER PILARSKI, individually and)
on behalf of similarly situated persons,)
)
Plaintiff,)
)
v.)
)
RENT RECOVER OF BETTER NOI LLC,)
later incorporated as RENT RECOVER, LLC,)
and BETTERNOI, LLC,)
)
Defendants.)

Case No. 17-cv-08659

Chief Judge Rebecca R. Pallmeyer

DECLARATION OF CURTIS C. WARNER

I, Curtis C. Warner declare that the following statements are true:

1. I received my undergraduate degree from Grand Valley State University, Allendale, Michigan, in 1993, my Masters Degree in Education from Wayne State University in 1998, and my Juris Doctorate from Michigan State University – Detroit College of Law (now Michigan State University – College of Law), *cum laude*, in 2002. During law school, I was the Editor-in-Chief for the Michigan State University – Detroit College of Law *Journal of Medicine and Law* and interned with the United States Army Judge Advocate General’s Office at Fort Carson in Colorado in the claims department.

2. In August 2002, I began working as an associate attorney at Collins & Blaha, P.C., an employment law firm that represents various school districts in the State of Michigan.

3. From April 2003 to March 2005, I worked as a staff attorney at Michigan Migrant Legal Assistance Project, Inc., (now Migrant Legal Aid) in Grand Rapids, Michigan, representing migrant farm workers in various labor and consumer disputes before administrative agencies, federal and state courts. During that time I represented a client before the Michigan Supreme

Court. *Lopez v. Hardy's Holsteins LLC*, 2005 MIWCLR (LRP) LEXIS 151 (Mich. WCAC, June 24, 2005) *sub nom. Lopez v. Worker's Compensation Appellate Comm'n.*, No. 263842, 2005 Mich. App. LEXIS 3312 (Mich. App., Sept. 23, 2005); 704 N.W. 2d 709, 474 Mich. 893 (Mich. 2005). I am currently a board member of Migrant Legal Aid and am counsel on several pending cases in which Migrant Legal Aid is also counsel of record.

4. From March 2005 to September 2006, I was an associate attorney at the consumer class action law firm of Edelman Combs Lattuner & Goodwin LLC in Chicago, Illinois ("Edelman Combs"). "Edelman, Combs, Lattuner & Goodwin, LLC, [is] a small Chicago law firm specializing in consumer credit, debt collection, FDCPA, predatory lending practices, and class action litigation." *Miller v. Midland Credit Mgmt.*, 08 C 780, 2009 U.S. Dist. LEXIS 16273 * 6-7 (N.D. Ill. Mar. 2, 2009).

5. In October 2006, I started Warner Law Firm, LLC, and am the principal member of the firm. I am a solo practitioner and do not have any staff.

6. I am a member of both the Michigan (Admitted 2002) and Illinois (Admitted 2004) bars and am admitted to practice before the following Courts: Supreme Court of the United States, Seventh Circuit Court of Appeals, Sixth Circuit Court of Appeals, Northern District of Illinois, Central District of Illinois, Eastern District of Michigan, Western District of Michigan, Northern District of Indiana, Southern District of Indiana and Eastern District of Wisconsin. I have also been permitted to practice *pro hac vice* in the District of New Jersey, the Eastern District of Virginia, Monterey County, California, and the Middle and Southern Districts of Florida.

7. I am a member of the Trial Bar of the Northern District of Illinois, having twice served the Court as appointed counsel in Title VII cases, once in a bank financing case, once in a FCRA case and once in a prisoner rights case. I have also performed *pro bono* work for the Legal

Assistance Foundation of Metropolitan Chicago taking a mortgage fraud case to trial after 3 ½ years of litigation and obtaining a modest five-figure judgment against one defendant, a six-figure settlement from the other defendants, and waived my legal fees for the benefit of the indigent client whose home was taken from her.

8. Since its founding in 2006, I have been approved as a class counsel in the following matters to which final approval has been granted: *Loveday v. Financial Asset Management Systems, Inc.*, 2:18-cv-10218-GAD-MKM (E.D. Mich. May 24, 2019) (FDCPA); *Dilallo et al. v. Miller and Steeno, P.C., et al.*, 16 C 51 (N.D. Ill. Mar. 16, 2018) (FDCPA); *Patel v. AT&T Services, Inc.*, 15 C 8174 (N.D. Ill. Sept. 20, 2017) (TCPA – Autodialer); *Florence Mussat, M.D., S.C. v. E.S. Medical Supplies and Equipment Inc.*, 16 C 1240 (N.D. Ill. Sept. 13, 2017) (TCPA – Junk Fax); *Tsang v. Zara USA, Inc.*, 15-cv-11160 (N.D. Ill. Nov. 2, 2016) (FCRA – Receipt); *Vasquez v. Zara USA, Inc.*, 15 C 3433 (N.D. Ill. March 8, 2016) (FCRA – Receipt); *Florence Mussat, M.D., S.C. v. Insurance Group of America Holdings, LLC.*, 13 C 7798 (N.D. Ill. May 7, 2015) (TCPA – Junk Fax); *Krishnan et al. v. Autovest LLC*, 13 C 8654 (N.D. Ill. Mar. 27, 2015) (FDCPA); *Paci v. Elmhurst Auto Werks, LTD*, 14 C 1158 (N.D. Ill. Feb. 2, 2015) (FCRA – Receipt); *Pursak v. Lumber Liquidators, Inc.*, 12 C 6984 (N.D. Ill. Nov. 17, 2014) (FCRA – Receipt); *Florence Mussat M.D., S.C. v. Betterdoctor, Inc.*, 13 C 8377 (N.D. Ill. July 10, 2014) (TCPA Junk Fax); *Sanders et. al. v. W&W Wholesale, Inc.*, 11 C 3557 (N.D. Ill. Apr. 11, 2014) (FCRA – Receipt); *Bargains in a Box, Inc.*, 13 C 3964 (N.D. Ill. Mar. 27, 2014) (FCRA – Receipt); *Florence Mussat M.D., S.C. v. Global Healthcare Resource, LLC*, 11 C 7035 (N.D. Ill. Nov. 1, 2013) (TCPA Junk Fax); *Tang v. Medical Recovery Specialists Inc.*, 11 C 2109 (N.D. Ill) (FDCPA); *Tang v. Pita Inn Inc*, 11 C 3833 (N.D. Ill. May 2, 2012) (FCRA – Receipt); *Balbarin v. North Star Acquisition, LLC*, 10 C 1846 (N.D. Ill. Apr. 12, 2012) (TCPA Autodialer); *O’Hara*

v. Medieval Times USA, Inc., 3:10-cv-751 (D. N.J. Mar. 6, 2012) (FCRA – Receipt); *Todd v. HB Windows and Doors, Inc.*, 10 C 4986 (N.D. Ill. Aug. 18, 2011) (FCRA – Receipt); *Seppanen v. Krist Oil Co.*, 2:09-cv-195 (W.D. Mich. Aug. 9, 2011) (FCRA – Receipt); *Vallejo v. National Credit Adjusters, LLC*, 10-cv-103 (N.D. Ind. Nov. 3, 2010) (FDCPA); *Mitchem v. Northstar Location Services, LLC*, 09 C 6711, (N.D. Ill. May 13, 2010) (FDCPA); *Housenkamp v. Weltman, Weinberg & Reis, Co. of Michigan*, Case No. 1:09-cv-10613-TLL-CEB (E.D. Mich. May 11, 2010) (FDCPA); *Kern v. LVNV Funding, Inc.*, 09 C 2202, (N.D. Ill. Jan. 21, 2010) (FDCPA); *Prieto et al. v. HBLC, Inc. and Steven J. Fink & Assoc., P.C.*, 08 C 2817 (N.D. Ill. Dec. 15, 2008) (FDCPA); *Dobson v. Asset Acceptance LLC*, 07 C 6203, (assigned as related to 07 C 5967) (N.D. Ill. 2008) () (FDCPA); *Horton v. IQ Telecom*, 07 C 2478 (N.D. Ill. May 5, 2008) (FDCPA).

9. In *Cavin v. Home Loan Center, Inc.* 236 F.R.D 387 (N.D. Ill. 2007), a specific finding regarding my ability as class counsel was made in that, “[t]he Court finds that Mr. Warner [is]. . . ‘experienced, competent, qualified and able to conduct the litigation vigorously’”, and therefore met the adequacy of class counsel requirement under Rule 23(a)(4)). *Id.* at 395.

10. I was the primary brief writer on *Mitchem v. Illinois Collection Service*, 271 F.R.D. 617 (N.D. Ill. 2011) and *Balbarin v. North Star Capital Acquisition*, 2011 U.S. Dist. LEXIS 686 (N.D. Ill. Jan. 5, 2011), which are the first two cases in the nation granting a contested class certification motion for claims brought under the Telephone Communication Protection Act for calls to cellular telephones without express prior consent.

11. I contributed to the writing of the plaintiffs’ joint brief in a TCPA matter of first impression and was second chair at oral argument in the Seventh Circuit in *Soppet v. Enhanced Recovery, Co., LLC*, 679 F.3d 637 (7th Cir. 2012).

12. I have represented successful objectors before the Seventh Circuit in reversing the District Court's approval of a nationwide class action settlement. *Redman v. RadioShack Corp.*, 768 F.3d 622 (7th Cir. 2014).

13. I have filed a petition for writ of certiorari to the United States Supreme Court. *Nicaj v. Shoe Carnival, Inc.*, 135 S. Ct. 1429 (2015) (*cert denied*).

14. Since beginning the practice of law, I have been involved in the litigation of over 250 cases on behalf of consumers in the courts to which I am admitted.

15. Since forming Warner Law Firm, LLC, I have filed over 100 cases on behalf of consumers throughout the federal district courts of Illinois, Michigan and Indiana and have represented clients' interests before the Seventh and the Sixth Circuit Court of Appeals. Since beginning the practice of law, I have been involved in the litigation of over 250 cases on behalf of consumers in the courts to which I am admitted.

16. Warner Law Firm, LLC also defends consumers in state court proceedings filed by their alleged creditors and/or assignees. The firm has billed out my hourly time at a discount as these consumers are typically financially distressed.

17. As of August 1, 2009, in such state court cases Warner Law Firm, LLC charges and has been paid for my services at an hourly rate of \$305 per hour, August 1, 2010, at \$320 per hour, August 1, 2011, \$340 per hour, August 1, 2012, \$360 per hour, August 1, 2013, \$400 per hour, August 1, 2014, the firm increased my hourly rate to \$450 per hour. The firm's current billing rate in greater Chicago, Illinois area for my time is \$550 per hour.

18. I have received specific awards for my hourly rate as follows:

Illinois Cases

a. *Schwersenska v. Brookfield Consulting Group, Inc.*, 13 cv 50383 (N.D. Ill. Feb. 17, 2015) (finding that Plaintiff's requested hourly rate of \$450 per hour was "a reasonable rate") *report and recommendation affirmed* (Mar. 9, 2015);

b. *Prusak v. Lumber Liquidators, Inc.*, 12 C 6984 (N.D. Ill. Nov. 11, 2014) (approving a \$450 hourly rate);

c. *Tang Rincon v. Taqueria Los Comales #1, Inc.*, 13 C 2712 (N.D. Ill. Apr. 30, 2014) (approving a \$400 per hour rate);

d. *Florence Mussat M.D., S.C. v. Global Healthcare Resource, LLC*, 11 C 7035 (N.D. Ill. Nov. 1, 2013) (approving hourly rate of \$400 for work done after August 1, 2013, \$360 August 1, 2012-2013, \$340 August 1, 2011-2012, and \$320 for work done prior to August 1, 2011);

e. In *Bautista v. Feedman Anselmo Lindberg LLC*, et al., 13 C 3962, (N.D. Ill. Sept. 24, 2013), (approving a \$360 hourly rate pre-August 1, 2013, as reasonable);

f. *Todd v. HB Windows and Doors, Inc.*, 10 C 4986 (N.D. Ill. Aug. 18, 2011) (the court in a class action brought under the FACTA amendments to the Fair Credit Reporting Act awarded Mr. Warner 1/3 of the settlement fund established and in doing so commented on the record that it was more than a fair amount acknowledging that it was slightly higher than what the *Lodestar* calculation would have been at \$305 per hour for work done prior to August 1, 2010, \$320 per hour for work done prior to August 1, 2011, and \$340 per hour for work done after August 1, 2011);

g. *Todd et al v. New Quick Market*, 11 C 1532 (N.D. Ill. July 7, 2011) (\$320); *Sanders v. Golden Kitchen*, 10 C 1290 (N.D. Ill. Aug. 5, 2010) (\$305); *Todd et al. v. Licores*

El Potrillo, 10 C 1135 (N.D. Ill. July 8, 2010) (\$305); and *Sterling v. Blatt Hasenmiller*, 09 C 1288, (N.D. Ill. Apr. 23, 2009) (\$305);

Michigan Cases

a. *Loveday v. Financial Asset Management Systems, Inc.*, 2:18-cv-10218-GAD-MKM, ECF No. 33, (E.D. Mich. May 24, 2019) (finding that the requested hourly rate of \$400 per hour in the Eastern District of Michigan in an FDCPA case is reasonable);

b. *Burton v. RAB Performance Recoveries L.L.C.*, 1:11-CV-261, Doc #51, Opinion and Order, p. 5 (W.D. Mich. Nov. 7, 2011) (\$300).

19. However, depending on how the district court views the complexity of the case and the number of attorneys involved, such as four, a reduction in Mr. Warner's rate has been upheld to unspecified amount so long as the ultimate reasons for the total amount of the award to all counsel is apparent on the record. *Schlacher v. Law Office of Phillip J. Rotche & Associates, P.C.*, 574 F.3d 852 (7th Cir. 2009) *rehearing denied* by 2009 U.S. App. LEXIS 22080 (7th Cir. Sept. 28, 2009); *Jerman v. Carlisle, McNellie, Rini, Kramer & Ulrich LPA*, 559 U.S. 573, 598 n. 16 (2010) (*quoting Schlacher*, 574 F.3d at 854-55) (a downward adjustment to the loadstar was affirmed by the Seventh Circuit where existed the "unnecessary use of multiple attorneys . . . in a straightforward, short-lived [FDCPA] case.").

20. Attached to this declaration as Appendix 1 is the record of my time and costs advanced to the client through July 26, 2019.

21. This matter was taken on a contingency of success basis, with Plaintiff's counsel only being able to recover their attorney's fees and costs from the Defendants via a settlement or a Court award.

22. If Plaintiff were not to prevail or a settlement was not reached, neither of Plaintiff's counsel would not recover any attorney's fees.

23. I have utilized billing in time increments of six minutes as ".1".

24. My time in this case was kept contemporaneously using time notes and imputed into an Excel spreadsheet.

I Curtis C. Warner declare under penalty of perjury that the foregoing is true and correct.

Executed on July 26, 2019

/s/ Curtis C. Warner
Curtis C. Warner

Curtis C. Warner
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APPENDIX 1

Date	Description	Time	Costs
	TOTALS	144.6	\$5,613.50
9/15/17	Comm. w/ Evancheck (Bankruptcy Atty) re: Pilarski issue with collection letter after BK	0.1	
9/17/17	Pilarski retainer agreement	0.1	
11/9/17	emal from Evancheck re: Pilarski	0.1	
11/15/17	Resaerch, Draft Complt	2.2	
11/16/17	Resaerch and cont draft	0.5	
11/16/17	Comm. w/ Evancheck re: client dox, send draft of complt, rev. w. Pilarski	0.2	
11/29/17	Call w/ Evancheck / Pilarski	0.2	
11/30/17	Filing Fee		\$400.00
12/4/17	Review Order re: MIDs and review MIDs standing order anc checklist	0.4	
12/7/17	Review order	0.1	
12/11/17	Process Server		\$69.00
12/27/17	emails from/to S. Strickler and resp.	0.1	
1/2/18	Rev. Ct. Order and email to OC requesting face to face meeting and dates of availability	0.1	
1/3/18	email to OC about avaiability on Thur. for face to face, read resp and rply	0.1	
1/4/18	emails from/to S. Strickler and resp.	0.1	
1/4/18	Face to face meeting w/ Strickler w/walk to office	1	
1/5/18	emails with Evancheck for BK documents	0.1	
1/8/18	emails with JE re: notice of BK to Haubor Club	0.1	
1/10/18	Rev. of MTD	0.1	
1/10/18	Call to JE and rev. of his view of Mich law and arg. MTD	0.3	
1/11/18	Rev. JRS and email to SS	0.1	
1/11/18	Research and Draft Resp to MTD	5.8	
1/11/18	Research and Draft Resp to MTD 18:30-20:33	2.1	
1/12/18	Research and Draft Resp to MTD & Revise	1.3	
1/17/18	File clean copy of JSR	0.1	
1/17/18	email to Pilarski	0.1	
1/18/18	email from Pilarski	0.1	
1/24/18	cont resaerch and editing of resp in opp to MTD Counts I & II	1.8	

1/29/18	File Resp to MTD	0.1	
1/29/18	Travel to Court (Morning Rush Hour) (1.5)	1.5	
1/29/18	Court	0.4	
1/29/18	Travel from Court (.5)		
1/29/18	Review Order and Calendar	0.1	
2/7/18	Review Client Dox and Draft Initial Disclosures	1.7	
2/8/18	Email to Client to review and respond to initial Disclosures	0.1	
2/9/18	Draft Certificate of Service of MID and efile	0.1	
2/10/18	Review Def. MID and send Rule 37 email to OC re: omissions and missing documents and to	0.8	
2/13/18	Research and prep for oral arguments	2	
2/14/18	Research and prep for oral arguments	4	
2/15/18	Travel to from court (Metra) (2)		
2/15/18	Draft Oral Argument Outline in Court	0.5	
2/15/18	Oral arguments	0.4	
2/15/18	Phone call to JE re: opinion and issues moving forward with case	0.2	
2/23/18	email to OC re: insurance policy not provided	0.1	
2/23/18	email from SS, rev. of dox	0.2	
3/6/18	Draft Supp Resp MID	0.1	
3/6/18	Draft discovery requests	1.4	
3/6/18	email to Strickler	0.1	
4/3/18	emails from/to S. Strickler and resp.	0.1	
4/20/18	email to S. Strickler had not rec'd disc.	0.1	
4/23/18	email to SS re: had not rec'd discovery due by stip on April 1, where is it?	0.1	
4/24/18	email to OC re: status of again overdue discovery responses.	0.1	
4/24/18	Rev. of Ins policy and fax to Hiscox regarding lawsuit to make sure it has notice of lawsuit to	0.2	
4/24/18	Revise proposed PO	0.1	
4/24/18	Review of Def's disc responses and draft notes for R 37 conf	0.3	
4/24/18	email from oc re: dep and resp req Rule 37 conf, on dep and disc production	0.1	
4/24/18	email to plt re: discovery responses and formulating settlement demand on a class basis	0.1	
5/1/18	Phone conf w/ Plt. Re his settlement authority	0.1	
5/1/18	email w/ Settlement demand	0.1	

5/1/18	Draft talking points for Rule 37 conf	0.3	
5/1/18	Rule 37 telephonic Rule 37 conf.	0.5	
5/1/18	email to Plt. Recap of conv. w/ OC, settlement demand, and issue of dissolution	0.1	
5/14/18	email from SS re: Def Rog resp	0.1	
5/16/18	email from SS re dep dates of GT	0.1	
5/18/18	email to SS	0.1	
5/19/18	Draft notice of Dep for GT and Rule 30(b)(6) topics	0.3	
5/24/18	email to Strickler re: status of sample leases and BK scrub info, resp from ss	0.1	
5/29/18	Book Court Reporter	0.1	
5/29/18	email from SS with dox	0.1	
5/30/18	email from SS w/ sample leases and review	0.4	
5/31/18	email to SS re: redaction of landlords, and rev. SS email with names of LL	0.1	
5/31/18	Dep Perp for Torche dep.	2	
6/1/18	Dep of Greg T.	2.3	
6/1/18	email to Strickler whether she would accpet SOP for Sub to M&S, and resp from SS	0.1	
6/1/18	email to Pilarski	0.1	
6/4/18	email SS re: Pilarski Dep Date	0.1	
6/4/18	emails w/ plt	0.1	
6/4/18	Draft sub to M&S	0.2	
6/4/18	Flight Adv. For Plt. UA DTW->ORD->DTW		\$213.40
6/14/18	email from SS w/ disc. To plt	0.1	
6/18/18	email from SS re: M&S obj to sub	0.1	
6/18/18	Dep Tr. Toache		\$663.85
6/24/18	emails from/to Pilarski	0.1	
6/25/18	Draft Pilarski Dep. Perp Sheet	1.5	
6/25/18	email to Pilarski	0.1	
6/29/18	email to/from Plt	0.1	
6/30/18	Call w/ Plt re: dep prep	0.5	
6/30/18	email to plt	0.1	
7/2/18	Pick up Pilarski at ORD and drive downtown, dep prep	0.7	
7/2/18	Court	0.4	

7/2/18	Dep Prep of Mr. Pilarski	1.5	
7/2/18	Defend Dep of Mr. Pilarski	1	
7/2/18	Drive Mr. Pilarski out to ORD	0.7	
7/2/18	email exchanges w/ SS re: dep	0.1	
7/10/18	Draft Am. Complt, Resaerch	2.4	
7/12/18	finalize Am . Complt and efile	0.1	
7/12/18	email Clerk of Court for Summons for BetterNOI	0.1	
7/13/18	emails w/ Pilarski re: discovery	0.1	
7/13/18	Follw up email to Court Reportr on 6/20 transcript request	0.1	
7/16/18	Review and Draft Responses to Interrogatories and Document Requests	3.5	
7/16/18	Recpt of Pilarski signed discovery responses	0.1	
7/16/18	email to OC with discovery resp and COS	0.1	
7/18/18	Prcess Server Better NOI		\$95.00
7/27/18	Court hearing transcript 2/15/18		\$58.40
8/1/18	Dep Tr. Pilarski		\$212.29
8/6/18	Research and Draft Resp on Opp to BetterNOI MTN Diss, edit, and finalize	9.8	
8/7/18	Resaerch and Draft Class Cert MTN	3.5	
8/8/18	Travel to and from Court (1.8)		
8/8/18	Court	0.4	
8/18/18	Research of BNOI property and interrconec. For SJ	0.4	
8/18/18	email from plt	0.1	
8/20/18	Remb. Plt. Adv. For Parking at DTW to travel for 7/2 Dep.		\$13.00
8/21/18	Travel to and from Court (1.8)		
8/21/18	Court	0.4	
8/24/18	Resaerch post dissolution of RR	0.3	
9/5/18	Reply to Class Cert	5.9	
9/8/18	SJ SMF	1.3	
9/10/18	SJ SMF	0.3	
9/15/18	SJ SMF	2	
9/17/18	Mtn for SJ and SMF	9.3	
10/10/18	Resaerch and formulate arguments for Court in opp to Defs MTN for po	0.5	

10/10/18	Rule 37 email re: BetterNOI dox production	0.3	
10/12/18	Travel to and from Court (1.8)		
10/12/18	Court	0.4	
8/21/18	email to SS re: revisiting tax document request.	0.1	
8/23/18	Rev. Am. Answer	0.1	
8/23/18	emails w/ SS re: tax dox	0.1	
8/29/18	Rev. of Defs Class Resp	0.3	
8/30/18	email to SS re: redacted exhibit	0.1	
9/4/18	Draft notice of BNOI dep notice	0.2	
9/4/18	Draft dox req to BNOI	0.2	
10/22/18	Dep Prep for Rule 30(b)(6) BetterNOI and Fortner	3	
10/22/18	email w/ BNO supp dox resp	0.1	
10/23/18	Deposition of BetterNOI / Fortner	1.2	
11/1/18	Research, Draft , revise and finalize Reply in support of MTN for Summary Judgment	9.5	
11/6/18	Follow up email on the consolidated returns	0.1	
11/7/18	Fortin Dep Trans		\$709.10
11/12/18	Rev. Fortin Dep Trans, Research and draft MTN to Enf and Compel Disc.	4	
11/16/18	To From Court (1.7)		
11/16/18	Court	0.3	
11/27/18	rev. of email from J Messer w/ pro forma returns and resp email	0.2	
11/27/18	email exchange w/ Borozan re ct order on what tax forms to be produced	0.1	
12/3/18	Research and Draft MTN for Sanctions - Enforce	1.4	
12/3/18	email to plt	0.1	
12/7/18	to From Court (1.8)		
12/7/18	Court	0.4	
12/10/18	settlement comm. w/ SS	0.1	
12/13/18	Transcript of 11/16 hearing		\$38.80
12/18/18	settlement comm. w/ SS	0.1	
12/19/18	email from plt re: settlement comm resp	0.1	
1/11/19	Court, and follow up with OC	0.4	
1/11/19	To From Court (1.8)		

1/11/19	Settlement comm. w/ SS	0.1	
1/16/19	Emails w/ OC re settlement	0.1	
1/16/19	Draft Proposed Order and Notice of Class Pendency	1.1	
1/16/19	email to plt re: Defs offer	0.1	
1/17/19	email from plt re: settlement counter offer	0.1	
1/17/19	emails w/ SS re settlement	0.1	
1/18/19	emails to / from First Class from quote on notice	0.1	
1/31/19	Excel Class list email, and brief look	0.1	
2/4/19	email to Pilarski re: \$30,000 indiv. Offer / email back from Pilarski	0.1	
2/4/19	email to Strickler re: Plt. Resp to offer and class counter offer	0.1	
2/5/19	Review of Def MTN to amend order	0.1	
2/7/17	Review of Landlord placement Files	4	
2/9/19	Review of Landlord Placement Files	5	
2/10/19	Cont. Review of Files and Draft of MTN to change class def and to supp MSJ	6.3	
2/11/19	to/from court (1.8)		
2/11/19	Court (long call)	0.7	
2/11/19	email to DuFay for Proof reading services	0.1	
2/14/19	Edit and revise arguments, proof and file Am. MTN Amend Class Def. and Supp SJ	2.3	
2/15/19	emails from/to JM and Call w/ JM re: potential settlement	0.1	
2/15/19	email to Pilarski re: settlement, and resp from Pilarski 2/16	0.1	
2/15/19	DuFay proof reading services		\$8.34
2/20/19	Travel to and from Court (1.8)		
2/20/19	Court	0.4	
2/21/19	Call w/ JM re: listen to Def sett pos.	0.1	
2/26/19	Draft mtn	0.1	
3/8/19	Call w/ Court re: Settlement Conf	0.2	
3/27/19	Draft Settlement Conf. Letter	1.5	
3/28/19	Draft Settlement Conf. Letter	2.1	
4/18/19	Rev. of Defs' settlement pos. letter	0.2	
4/18/19	Comm. w/ Plt.	0.2	
4/23/19	Comm. w/ Plt.	0.2	

4/24/19	Comm. w/ JM	0.2	
4/30/19	settlement emails with JM	0.2	
4/30/19	emails with first class	0.1	
5/1/19	emails confirming settlement on material terms	0.2	
5/1/19	email w/ first class re notice costs	0.1	
5/2/19	email to JM	0.1	
5/3/19	review of minute order	0.1	
5/9/19	Draft of Settlement Dox (Revisions of template)	1.5	
5/13/19	email from JM	0.1	
5/17/19	edits to settlement dox	0.1	
5/17/19	emails w/ JM	0.1	
5/20/19	Rev. proposed final order	0.1	
5/20/19	email to Plt.	0.1	
5/23/19	email from JM	0.1	
5/23/19	email to plt	0.1	
6/3/19	Court on Motion for Preliminary Approval	0.4	
6/3/19	To/From Court (1.8)		
6/3/19	emails w/ first class	0.1	
6/5/19	First Class Inc. Payment for Notice to the Class		\$3,132.32
6/5/19	emails re: entry of prelim order to first class	0.1	
6/5/19	emails re: costs of first class holding atty fee and class monies	0.2	
6/6/19	emails w/ SS and JM	0.1	
6/7/19	emails w/ SS and JM	0.1	
6/11/19	emails form first class admin and draft mtn to modify the Order	0.3	
6/13/19	emails re: class list from class admin	0.1	
6/28/19	Email from First Class that class notice went out on June 27	0.1	
7/1/19	Class member call	0.1	
7/2/19	emails from First Class and draft Notice of Service of CAFA and Class Notice	0.2	
7/2/19	Class member call	0.1	
7/15/19	Class member call	0.1	
7/23/19	Call from class member needing to update address, email to First Class	0.1	

7/26/19	Class member call	0.1	
7/26/19	Petition for Attorney's fees	3.1	
7/26/19	Call from class member needing to update address, email to First Class	0.1	